

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

In re VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC. SECURITIES  
LITIGATION

This Document Relates TO:

Case No. 3:15-cv-07658-MAS-LHG

Master No. 3:15-cv-07658-  
MAS-LHG

CLASS ACTION

Judge Michael A. Shipp

Magistrate Judge Lois H.  
Goodman

Special Master Hon. Dennis M.  
Cavanaugh, U.S.D.J. (Ret.)

**CERTIFICATION OF  
JEROME J. FROELICH, Jr.  
IN SUPPORT OF *PRO HAC  
VICE* ADMISSION OF  
ROBERT W. CLORE**

I Jerome J. Froelich, Jr. hereby certify as follows:

1. I am an attorney at law of the State of New Jersey, a member in good standing of the bar of this Court, and a member of the firm McKenney & Froelich, co-counsel for Objector Cathy Lochridge in this matter. I have personal knowledge of the facts set forth herein.

2. I make this certification in support of Plaintiffs' motion to admit Robert W. Clore *pro hac vice* as counsel for Objector Cathy Lochridge.

3. Robert W. Clore is Senior Appellate Counsel with the firm of Bandas Law Firm, PC, located at 500 North Shoreline Blvd., Suite 1020, Corpus Christi, Texas 78401. Mr. Clore has advised me that he is a member in good standing of the bars of the State Bar of Texas; the Texas Supreme Court; the Supreme Court of Texas; the United States District Court for the Southern District of Texas; the United States District Court for the Northern District of Illinois; the United States Courts of Appeals for the Second Circuit, Third Circuit, Fourth Circuit, Fifth Circuit, Sixth Circuit, Seventh Circuit, Eighth Circuit, Ninth Circuit, Tenth Circuit, Eleventh Circuit, and the United States Supreme Court. He is not under suspension, nor has he ever been suspended or disbarred from any court. Mr. Clore is fully familiar with the proposed settlement and request for attorneys' fees by class counsel, and the objection thereto.

4. There is good cause for the *pro hac vice* admission of Mr. Clore, as he is familiar with the proposed settlement and request for attorneys' fees by class counsel, and the objection thereto, and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Objector Cathy Lochridge in this matter.

5. Pursuant to Local Civil Rule 101.1(c)(4), my firm will appear in this action, including all court appearances on behalf of Objector Cathy Lochridge and agree to accept service of all notices, orders, and pleadings in this action. I will continue to serve as local counsel of record in this matter, and will review and sign all pleadings, briefs, and other papers filed with the court, will enter all appearances, sign all stipulations, and other such documents in this matter. I agree to be responsible for the conduct of the above-named counsel should he be admitted *pro hac vice*.

6. I am currently counsel of record in this matter and agree to continue to serve as counsel on behalf of Ms. Lochridge.

7. I will ensure that counsel will abide by Local Civil Rule 101.1(c).

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: May 6, 2020

/s/ Jerome J. Froelich, Jr.

Jerome J. Froelich, Jr.

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